

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

No. 4:19-cv-00957

ALYESKA MASTER FUND, L.P.,
ALYESKA MASTER FUND 2, L.P., and
ALYESKA MASTER FUND 3, L.P.,

Judge George C. Hanks, Jr.

Plaintiffs,

No. 4:22-cv-01189

v.

ALTA MESA RESOURCES, INC., *et al.*

Defendants.

ORBIS GLOBAL EQUITY LE FUND
(AUSTRALIA REGISTERED), ORBIS
GLOBAL EQUITY FUND (AUSTRALIA
REGISTERED), ORBIS GLOBAL
BALANCED FUND (AUSTRALIA
REGISTERED), ORBIS SICAV, ORBIS
INSTITUTIONAL GLOBAL EQUITY
L.P., ORBIS GLOBAL EQUITY FUND
LIMITED, ORBIS INSTITUTIONAL
FUNDS LIMITED, ALLAN GRAY
AUSTRALIA BALANCED FUND,
ORBIS OEIC, and ORBIS
INSTITUTIONAL U.S. EQUITY L.P.,

No. 4:22-cv-2590

Plaintiffs,

v.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants.

**BAYOU CITY ENERGY AND WILLIAM MCMULLEN’S MOTION FOR
LEAVE TO FILE UNDER SEAL
AN EXHIBIT SUPPORTING THEIR RESPONSE TO THE CLASS’S MOTION
TO UNSEAL**

Bayou City Energy and William McMullen respectfully request leave to file an unredacted copy of an exhibit under seal. The exhibit at issue is being filed as Exhibit 2 in support of Bayou City Energy and William McMullen’s response brief opposing the Class’s motion to unseal. This exhibit (Exhibit 2) discusses the same information that the response brief itself seeks to keep sealed. Because this exhibit concerns the same underlying information, it should be sealed for exactly the same reasons discussed in the response brief. In short, the exhibit quotes and references excerpts of deposition transcripts and other documents that have been designated “Confidential” or “Confidential Attorney Eyes Only” (the “Protected Materials”) under the Stipulation and Protective Order (Dkt. 190). To avoid multiplying the briefing, Bayou City Energy and Mr. McMullen incorporate their arguments in the response brief by reference.

Bayou City Energy and Mr. McMullen therefore request that the Court issue an order sealing Exhibit 2 to Bayou City Energy’s and William McMullen’s Response to Class Plaintiffs’ Motion to Unseal Defendant McMullen’s Motion for Summary Judgment and Accompanying Exhibits.

DATED: December 1, 2023

/s/ Nick Brown

Kenneth A. Young (*Attorney-in-Charge*)

Texas Bar No. 25088699 S.D. Tex. ID 2506614

Nick Brown

Texas Bar No. 24092182 S.D. Tex. ID 2725667

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

609 Main Street

Houston, Texas 77002

Phone: (713) 836-3600

Fax: (713) 836-3601

Emails: kenneth.young@kirkland.com

nick.brown@kirkland.com

***Counsel for Bayou City Energy Management,
LLC and William McMullen***

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on all counsel of record via the Court's electronic filing system on December 1, 2023.

/s/ Nick Brown

Nick Brown

CERTIFICATE OF CONFERENCE

Bayou City Energy and Mr. McMullen believe that Class Plaintiffs are opposed to this motion, as Class Plaintiffs are seeking to unseal the underlying information discussed in the exhibit that Bayou City Energy and Mr. McMullen seek to seal.

/s/ Nick Brown

Nick Brown